1 2 3 4	Jeff D. Friedman (173886) HAGENS BERMAN SOBOL SHAPIRO LLP 715 Hearst Avenue, Suite 202 Berkeley, California 94710 Telephone: (510) 725-3000 Facsimile: (510) 725-3001 jefff@hbsslaw.com	
5 6 7 8	Steve W. Berman (pro hac vice) HAGENS BERMAN SOBOL SHAPIRO LLP 1918 Eighth Avenue, Suite 3300 Seattle, Washington 98101 Telephone: (206) 623-7292 Facsimile: (206) 623-0594 steve@hbsslaw.com	
9 10 11 12 13	Marc A. Goldich (pro hac vice) Noah Axler (pro hac vice) AXLER GOLDICH, LLC 1520 Locust Street, Suite 301 Philadelphia, PA 19102 Telephone: (267) 534-7400 mgoldich@axgolaw.com naxler@axgolaw.com  Attorneys for Plaintiffs	
	UNITED STATES DISTRICT COURT	
15	NORTHERN DISTRICT OF CALIFORNIA  SAN JOSE DIVISION	
16		
17 18 19	IN RE SEAGATE TECHNOLOGY LLC LITIGATION	No. 3:16-cv-00523-JCS STIPULATION TO MODIFY CLASS CERTIFICATION DEADLINE
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Pursuant to Local Rule 6-2, the parties stipulate to an extension of time for filing Plaintiffs' Motion for Class Certification, Defendant's opposition to the same, and Plaintiffs' reply.

WHEREAS, the parties have encountered discovery delays that cannot be resolved prior to late August or early September, including but not limited to document productions relating to all ST3000DM001 models as ordered by the Court on June 9, 2017 (ECF 120) and multiple witnesses' availability for depositions,

WHEREAS, in light of the foregoing, based on the discovery requested and exchanged to date, granting the stipulated extension for briefing and hearing Plaintiffs' Motion for Class Certification will allow for a more complete and orderly presentation of the factual and legal issues the Court will need to resolve in connection with Plaintiffs' Motion, and will not have any effect on any later event or deadline already fixed by court order;

NOW THEREFORE, pursuant to Local Rule 6-2, the parties jointly make the stipulated request that this Court enter an order modifying the schedule for briefing and hearing Plaintiffs' Motion for Class Certification as follows:

Motion for Class Certification	November 8, 2017
Opposition to Motion for Class Certification	December 8, 2017
Reply in Support of Motion for Class Certification	January 5, 2018
Hearing on Motion for Class Certification	February 9, 2018, at 9:30 a.m.

Local Rules 6-2 and 7-1 permit the parties to stipulate provided that they, *inter alia*, reduce the stipulation to written form and file it with the Court. The stipulation is effective upon the Court's approval.

## IT IS SO STIPULATED.

1 DATED: August 3, 2017 HAGENS BERMAN SOBOL SHAPIRO LLP 2 By: <u>/s/ Steve Berman</u> 3 Steve W. Berman (pro hac vice) Ashley A. Bede (pro hac vice) 4 1918 Eighth Avenue, Suite 3300 Seattle, Washington 98101 5 Telephone: (206) 623-7292 Facsimile: (206) 623-0594 6 steve@hbsslaw.com ashleyb@hbsslaw.com 7 Jeff. D. Friedman (173886) 8 715 Hearst Avenue, Suite 202 Berkeley, California 94710 9 Telephone: (510) 725-3000 Facsimile: (510) 725-3001 10 jefff@hbsslaw.com 11 Marc A. Goldich (pro hac vice) Noah Axler (pro hac vice) 12 AXLER GOLDICH, LLC 1520 Locust Street, Suite 301 13 Philadelphia, PA 19102 Telephone: (267) 534-7400 14 mgoldich@axgolaw.com naxler@axgolaw.com 15 Attorneys for Plaintiffs 16 17 18 19 20 21 22 23 24 25 26 27

STIPULATION TO MODIFY CLASS CERTIFICATION - 2 Case No.: 3:16-cv-00523-JCS 010581-11 975001 V1

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1	DATED: August 3, 2017	SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
2		
3		By: <u>s/ Anna S, McLean</u> Anna S.McLean (142233)
4		Neil A.F. Popović (132403)
		Tenaya Rodewald (248563) Liên H. Payne (291569)
5		Joy O. Sui (307610) Four Embarcadero Center, 17 <sup>th</sup> Floor
6		San Francisco, CA 94111
7		Telephone: (415) 434-9100 Facsimile: (415) 434-3947
8		amclean@sheppardmullin.com npopovic@sheppardmullin.com
9		trodewald@sheppardmullin.com
		lpayne@sheppardmullin.com jsiu@sheppardmullin.com
10		Mukund H. Sharma (249125)
11		379 Lytton Avenue Palo Alto, CA 94301
12		Telephone: (650) 815-2600 Facsimile: ((650) 815-2601
13		msharma@sheppardmullin.com
14		Attorneys for Defendant
15	IT IS SO ORDERED.	
16		
17	DATED:	<u> </u>
18		CHIEF MAGISTRATE JUDGE JOSEPH C. SPERO
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20	STRING ATTOM TO MODIFY OF A SIGNED THE SIGN OF	

STIPULATION TO MODIFY CLASS CERTIFICATION - 3 Case No.: 3:16-cv-00523-JCS 010581-11 975001 V1

## ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3)

I, Steve W. Berman, am the ECF User whose identification and password are being used to file the foregoing document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that all signatories have concurred in this filing.

Dated: August 3, 2017

/s/ Steve W. Berman Steve W. Berman